

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA

v.

BLADIMIR RIGO,

Defendant.
-----X

:
:
: Case No.: 13 Cr. 897 (RWS)

:
: **DECLARATION OF**
: **SHARANYA SAI MOHAN**
:
:
:

SHARANYA SAI MOHAN hereby states as follows pursuant to 28 U.S.C. § 1746:

1. I am an associate at the law firm of Spears & Imes LLP, counsel for Defendant Bladimir Rigo. I am admitted to practice before this Court. I submit this Declaration in connection with Mr. Rigo's Post-Hearing Memorandum of Law.

2. Attached hereto as Exhibit A is a true and correct copy of the Pre-Sentencing Report for Mr. Rigo, dated July 22, 2014.

3. Attached hereto as Exhibit B is a true and correct copy of the transcript of the hearing before this Court ("Fatico Tr.") on October 7, 2014.

4. Attached hereto as Exhibit C is a true and correct copy of certain 3500 material provided by the Government¹ relating to Agent Antonio Rao, Rao 3502-1, [REDACTED]

[REDACTED]
[REDACTED]

5. Attached hereto as Exhibit D is a true and correct copy of the chart entered into evidence as Government's Exhibit ("GX") 218, consisting of a list of prescription medications recovered pursuant to a search warrant executed at 286 Sussex Avenue.

¹ 3500 material refers to materials provided by the Government to the defense pursuant to the Jencks Act, 18 U.S.C. § 3500.

6. Attached hereto as Exhibit E is a true and correct copy of the chart entered into evidence as GX-219, consisting of a list of prescription medications recovered pursuant to a search warrant executed at 23 Crane Street.

7. Attached hereto as Exhibit F is a true and correct copy of the transcript entered into evidence as GX-211-T, which transcribes and translates the recording of a meeting between Mr. Rigo and a Confidential Human Source, dated September 28, 2012.

8. Attached hereto as Exhibit G is a true and correct copy of certain 3500 material provided by the Government relating to Hermenegildo Fernandez, Fernandez 3504-27,

[REDACTED]

9. Attached hereto as Exhibit H is a true and correct copy of certain 3500 material provided by the Government relating to Hermenegildo Fernandez, Fernandez 3504-37,

[REDACTED]

10. Attached hereto as Exhibit I is a true and correct copy of Defendant Bladimir Rigo's Objections to the Presentence Investigation Report, dated August 6, 2014.

11. Attached hereto as Exhibit J and Exhibit K are true and correct copies of excerpts of materials entered into evidence as GX-204 and GX-207, respectively, consisting of copies of certain notebooks and papers therein recovered from Mr. Rigo's home.

12. Attached hereto as Exhibit L is a true and correct copy of the material entered into evidence as GX-202, consisting of copies of handwritten lists recovered from Mr. Rigo's home.

13. Attached hereto as Exhibit M is a true and correct copy of the government's letter pursuant to *United States v. Pimentel*, 932 F.2d 1029, 1034 (2d Cir. 1991), dated February 14, 2014.

14. Attached hereto as Exhibit N is a true and correct copy of the government's plea agreement proposed to Mr. Rigo, dated March 5, 2014.

15. Attached hereto as Exhibit O is a true and correct copy of the transcript of Mr. Rigo's plea allocution, dated April 23, 2014 (ECF No. 14).

16. Attached hereto as Exhibit P is a true and correct copy of certain 3500 material provided by the Government relating to Arcadio Reyes-Arias, Reyes-Arias 3503-35, [REDACTED]
[REDACTED]

17. Attached hereto as Exhibit Q is a true and correct copy of the official transcript of the plea allocution of Arcadio Reyes-Arias, dated July 31, 2013, in *United States v. Arcadio Reyes-Arias*, No. 13-cr-0051-PGG-1 (ECF No. 13).

18. Attached hereto as Exhibit R is a true and correct copy of the material entered into evidence as GX-212, consisting of a spreadsheet reflecting the Government's analysis of certain papers recovered from Mr. Rigo.

19. Attached hereto as Exhibit S is a true and correct copy of a chart entered into evidence as GX-213, entitled "10/12/12 Buy from Chino."

20. Attached hereto as Exhibit T is a true and correct copy of a chart entered into evidence as GX-214, entitled "12/2/2012 Buy from Chino."

21. Attached hereto as Exhibit U is a true and correct copy of a chart entered into evidence as GX-209, entitled "8/14/2012 buy from Rogelio Lebya [*sic*]."

22. Attached hereto as Exhibit V is a true and correct copy of a chart entered into evidence as GX-210, entitled "11/30/2012 buy from Rogelio Lebya [*sic*]."

23. Attached hereto as Exhibit W is a true and correct copy of certain 3500 material provided by the Government relating to Arcadio Reyes-Arias, Reyes-Arias 3503-26, [REDACTED]


[REDACTED]

24. Attached hereto as Exhibit X is a true and correct copy of certain 3500 material provided by the Government relating to Arcadio Reyes-Arias, Reyes-Arias 3503-34, [REDACTED]

[REDACTED]

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on November 14, 2014 in New York, New York.


Sharanya Sai Mohan